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Attorneys For Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

United States of America,

Plaintiff,

vs.

Samuel Rappylee Bateman, et. al.

Defendant.

3:22-CR-08092-DGC

**MOTION TO VACATE TRIAL,
MOTIONS DEADLINE AND
SCHEDULE A STATUS
CONFERENCE**
(Defendant in custody)

Defendant, Samuel Rappylee Bateman, hereby requests this Court vacate the deadline to file pretrial motions, currently set for February 3, 2023, vacate the trial, currently set for March 14, 2023, and schedule a Status Conference on the afternoon of March 7 or 9, 2023.

Undersigned counsel contemporaneously filed a Joint Motion for Complex Designation and requested a Status Conference be set on the afternoon of March 7 or 9, 2023.

Undersigned counsel has contacted Assistant United States Attorney, Dimitra Sampson, Esq., and she has no objections to this motion nor a Status Conference being

1 set on the afternoon of March 7 or 9, 2023. Counsel for co-defendants have no
2 objections to this request.

3
4 This Motion is made in good faith and not for purposes of delay. The ends of
5 justice served by granting this Motion outweigh the best interests of the public and the
6 Defendant in a speedy trial.

7
8 Undersigned counsel expects that excludable delay pursuant to Title 18
9 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) may occur as a result of the Motion or from
10 an order based thereon.

11
12 RESPECTFULLY SUBMITTED this 2nd day of February 2023.

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14 ATTORNEYS FOR FREEDOM LAW FIRM

15
16 /s/ Marc J. Victor
17 Marc J. Victor, Esq.
18 Attorney for Defendant
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 2, 2023, I filed the Original with the Clerk of the
3 Court using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to
4 the following CM/CEF registrants:

5 Dimitra Sampson, Esq.
6 Assistant U.S. Attorney

7 Cindy Castillo, Esq.
8 Counsel for Naomi Bistline

9 Sandra Kay Hamilton, Esq.
10 Counsel for Donnae Barlow

11 Stephen Wallin, Esq.
12 Counsel for Moretta Johnson

13 Emailed to chambers:

14 The Honorable David G. Campbell
15 Campbell_chambers@azd.uscourts.gov

16 By: /s/ Braeden Victor
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